

# Diamond Shamrock

99748  
Diamond ~~ORIGINAL~~ Chemical Company

DELAWARE CITY PLANT  
Delaware City, Delaware 19706  
302.834-4551

February 6, 1976

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Pasquale S. Canzano  
Department of Natural Resources  
and Environmental Control  
State of Delaware  
Dover, Delaware 19901

bcc: P. J. Cardich  
A. L. Gregoric  
E. R. Henderson  
J. W. Tankersley  
W. R. Taylor  
J. A. Vargo, Jr.

Dear Mr. Canzano,

Subject: Disposal of PVC Solid Waste  
Diamond Shamrock Corporation  
Delaware City, Delaware

I would like to continue our effort in obtaining a decision from you concerning the possibility of using a local commercial landfill to dispose of the solid waste from our PVC wastewater treatment plant. As you will recall, since the start-up of our waste treatment plant in September of 1974, we were left with no alternative but to make temporary arrangements for hauling this material to a landfill in the state of New Jersey. This was done primarily to allow your office additional time to evaluate this waste. Considerable time has now passed without any resolution to this problem.

You are probably aware that on September 18, 1975, the New Jersey State Supreme Court ruled to ban all out-of-state dumping. Although, with some exceptions, the court agreed to temporarily stay this ruling, it appears very likely that it will be reinstituted in the near future. It is my understanding that the state of Pennsylvania is also considering similar type of legislation. Such action, of course, would make our present waste hauling practice illegal and would require us to find another landfill disposal site.

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ORIGINAL  
(Red)

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In addition to this Supreme Court ruling, our disposal costs are prohibitive. Based on the past year our costs have averaged more than \$70 per dry ton. This is equivalent to approximately \$210 per day or \$80,000 per year. By using an existing local commercial landfill in the vicinity of our plant, we could reduce this cost substantially. We would like some guidance from your department, if possible, as to which local commercial landfills would be acceptable for our use.

After reviewing past correspondence with yourself, Dr. Otto, Dr. Go and Mr. Apgar, I believe we have submitted all the requested samples and analyses of this waste material with one possible exception. My records indicate that you may not have received our leachability test results on this waste. If this is the case, please find attached herewith a copy of these results. The procedure used for this test was that described in a letter from Mr. Apgar on December 2, 1974 and later clarified by a letter from Dr. Otto on February 20, 1975. We would also appreciate receiving a copy of any test results you have done.

We would appreciate your review and consideration of this matter at your earliest possible convenience.

Sincerely,

DIAMOND SHAMROCK CHEMICAL COMPANY

*Scott C. Gordon*

Scott C. Gordon  
Senior Environmental Engineer

SCG/pcr

Attachment

CC: Mr. A. Apgar  
Dr. Lee Go  
Dr. H. W. Otto  
Mr. N. C. Vasuki

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LEACHATE ANALYSIS  
PVC PLANT WASTEWATER TREATMENT PLANT SLUDGE  
DIAMOND SHAMROCK CORPORATION  
DELAWARE CITY, DELAWARE

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(All values are mg/l except pH and % solids)

Date Sampled	March 26 to April 6, 1975 com
Date Analyzed	April 29, 1975
% Solids	33.4
pH	6.7
Acidity	48
Alkalinity	6

<u>Adjusted pH</u>	<u>4.0</u>	<u>7.0</u>	<u>10.0</u>
COD	82	74	234
TOC	25	23	64
Phenol	0.015	0.016	not applicable
Chloride	35	35	35
Sulfate	17	14	20
Kjeldahl - N	1.5	1.3	3.6
Ammonia - N	See footnote 3. below		
Nitrate	7	29	64
Hardness	65	36	10
Sodium	26	24	26

1. A Split sample of this material was sent to the State of Delaware ( Dr. Otto) on April 16, 1975.
2. All test procedures used are described in letters from Mr. Apgar and Dr. Otto dated December 2, 1974 and February 20, 1975 respectively.
3. All analysis were done by Diamond Shamrock Corporation at Morristown, New Jersey with the exception of TKN, Ammonia and Nitrate which were done by a commercial laboratory. A value for Ammonia - N was inconclusive due to interference.

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